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9 *[Proposed] Reorganization Counsel for Debtor*

E-FILED: October 5, 2009

7 **UNITED STATES BANKRUPTCY COURT**  
8 **FOR THE DISTRICT OF NEVADA**

10 In re:

11 AIRCRAFT INVESTOR RESOURCES, LLC  
12 a Nevada limited liability company;

13 Debtor

Case No. 09-26950  
Chapter 11 voluntary

Date: November 12, 2009  
Time: 1:20 p.m.

14  
15 **DECLARATION OF JEFF SANDERS IN SUPPORT OF DEBTOR'S APPLICATION TO**  
16 **EMPLOY COUNSEL NUNC PRO TUNC TO THE PETITION DATE**

17 I, Jeff Sanders, hereby declare as follows:

18 1. I am the current Manager of Aircraft Investor Resources, LLC, a Nevada limited liability  
19 company ("AIR"). I make the following statements in that capacity, and based on my personal  
20 knowledge and the business records of AIR.

21 ***REORGANIZATION COUNSEL***

22 2. AIR has selected Kupperlin Law Group, LLC ("Kupperlin Law") as its Nevada  
23 reorganization counsel. Having interviewed several firms in contemplation of a bankruptcy filing, I  
24 became comfortable with choosing Kupperlin Law and its principal lawyer to provide representation  
25 for Debtor in this bankruptcy proceeding.

26 3. Prior to the bankruptcy filing, AIR signed a Chapter 11 Bankruptcy Fee Agreement with  
27 Kupperlin Law. That document specified a security retainer of \$16,000, which was paid pre-  
28

1 petition from third-party funds. (I paid \$8,000 from my personal funds, and \$8,000 was paid by  
2 Mike Shealy from his personal funds.)

3 4. To the best of my knowledge, Kupperlin Law does not have any connection to or adverse  
4 to the interests of AIR.

5 ***LOCAL OREGON COUNSEL***

6 5. AIR has selected Balyeat Eager & Steele, LLP ("*Balyeat*") as its local Oregon business  
7 counsel. Prior to bankruptcy, AIR had previously employed Balyeat for a variety of local Oregon  
8 business-law matters, including litigation and statutory landlord liens.

9 6. Balyeat is highly familiar with AIR's situation, including the current Oregon litigation,  
10 the Oregon eviction, and the legal positions of the kit-builder creditors.

11 7. Balyeat does not currently hold any AIR funds on retainer.

12 8. Although Balyeat is a minor creditor due to unpaid pre-petition work performed, to the  
13 best of my knowledge, Balyeat does not have any other connection to, or adverse interest to, AIR.

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16 I make the foregoing statements on October 2, 2009, under penalty of perjury under the laws of the  
17 United States.

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19 \_\_\_\_\_  
20 JEFF SANDERS